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June 28, 2017

Via ECF/CM

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. El Gammal*, 15-cr-588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

I, along with Donald Duboulay, represent Mr. Ahmed El Gammal. This Court appointed us following his conviction at trial in January of this year. After that appointment, we have been in communication with Mr. El Gammal's prior counsel and have coordinated with United States Department of Justice ("DOJ") Litigation Security personnel to obtain access to classified materials. That process, however, has taken longer than anticipated and I was only able to receive my DOJ indoctrination in this case last month. Additionally, discussion of potential post-trial issues with Mr. El Gammal has taken some time, given the need for defense counsel to obtain and familiarize ourselves with all pre-trial litigation and trial issues.

Currently, post-trial defense motions are due on June 30, 2017. However, in order for defense counsel to have the necessary familiarity with not only the pre-trial and trial proceedings but also all case-related documents that will allow us to meaningfully engage in a discussion with our client about post-trial motions, we need additional time. Given other deadlines over the course of the next two months, including several time-intensive appellate matters, as well as work and personal travel schedules, we are respectfully requesting that the currently scheduled deadline for defense motions be moved to September 29, 2017, with other due dates adjusted accordingly.

This is the second such request for an adjournment since Mr. Duboulay and I were appointed by this Court. The government consents to the request.

Respectfully submitted,

/s/ Megan W. Benett

cc: All counsel of record via ECF/CM

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